Code of Ethical Business Conduct

"A college administrator is expected to be more than a financier, more than a school master. He [or she] must be in some tangible and expressive way ‘the corporate consciousness of the College.’" ¹

I. INTRODUCTION

It is the goal of Dartmouth College to adhere to the highest ethical standards in all that it does. Dartmouth College expects that those who are part of the College community, including trustees, faculty, staff and student employees ("Dartmouth Personnel") will adhere to such standards in their dealings with each other and with those beyond the College community. Ethical business conduct calls for all Dartmouth Personnel to assume responsibility for safeguarding and preserving Dartmouth’s assets and resources in the fulfillment of the College mission. Dartmouth will comply fully with all relevant laws and all contract and grant requirements, as well as with its own high standards of integrity and quality. Dartmouth Personnel are expected to assume personal responsibility and accountability for understanding relevant laws, regulations, and contract and grant requirements. In addition to complying with specific laws or regulations that govern business activities, standards of fairness, honesty, and respect for the rights of others will govern Dartmouth’s conduct at all times.

II. ETHICAL PRINCIPLES

a. Compliance with Laws

Dartmouth College will transact its business in compliance with the laws of the jurisdictions in which it does business. Dartmouth Personnel will familiarize themselves with any legal obligations arising out of the work done for Dartmouth, including but not limited to the obligations to comply with applicable recordkeeping requirements and not to retaliate against anyone who reports a suspected violation of the law. If questions arise regarding compliance with the law, or if it appears that a College policy conflicts with the relevant law, the personnel who become aware of that situation should contact the College office that has oversight responsibility for the policy, or the Office of the General Counsel.
b. Contractual and Grant Obligations

In addition to its commitment to comply with applicable laws, Dartmouth College recognizes its contractual obligations to donors, the government, suppliers, research sponsors, employees and others with whom it contracts. Regardless of the source of funds, Dartmouth College will adhere to its contractual obligations.

c. Integrity and Quality

Dartmouth Personnel should recognize that Dartmouth College has earned and must maintain a reputation for integrity and quality that goes beyond compliance with laws, regulations and contractual obligations. Dartmouth strives for excellence in administration as well as academics. Even the appearance of misconduct or impropriety can cause severe damage to the College's reputation. As such, Dartmouth Personnel must strive at all times to maintain the highest standards of quality and integrity.

d. Conflict of Interest

Dartmouth Personnel should avoid situations that create or appear to create conflicts between their personal interests and the interests of the College. All decisions made by Dartmouth Personnel in the course of their professional responsibilities to the College are to be made solely on the basis of their desire to promote the best interests of the College. If an individual's personal interests might lead an independent observer reasonably to question whether the individual's actions or decisions on behalf of the College are influenced by those personal interests, the individual should recuse himself or herself from the decision making process and notify the responsible College officials, as described in more detail in the Conflict of Interest Policy of Dartmouth College.

Special rules concerning disclosure of conflicts relating to research are described in the Conflict of Interest Policy. In addition, it is the College's policy to comply in all respects with State and Federal laws concerning conflicts of interest, including the New Hampshire Pecuniary Benefit Law, which governs transactions between New Hampshire charitable organizations and their trustees and officers. Further information concerning the Pecuniary Benefit Law may be obtained from the Office of the General Counsel.
e. Confidential Information

Dartmouth Personnel may have access to confidential, proprietary and private information. Those who have access to this information may not make any unauthorized use or disclosures of the information, either during or after employment.

f. Antitrust Considerations

Like other economic enterprises, colleges are subject to federal and state antitrust laws, which are aimed at protecting competition. For this reason, Dartmouth Personnel should avoid agreements or exchanges of information with other colleges and universities that adversely affect economic competition between institutions. Dartmouth Personnel should never enter into agreements with other colleges or universities regarding future tuition, fees, financial aid, or salary levels. In addition, it is ordinarily inadvisable for Dartmouth Personnel to disclose or exchange future plans or projections concerning these subjects with other colleges or universities. Dartmouth Personnel should not participate in surveys concerning these matters unless the survey seeks public information or information that is historical in nature. Dartmouth Personnel who have affiliations with other colleges and universities (e.g., on the board of trustees of another institution) should not disclose Dartmouth's non-public business information to the other institution, or vice versa.

g. Financial Reporting

All College accounts, financial reports, tax returns, expense reimbursements, time sheets and other documents, including those submitted to government agencies, must be accurate, clear and complete. All entries in College books and records, including departmental accounts and individual expense reports, must accurately reflect each transaction.

h. Authority to Contract

All College transactions must be authorized by appropriate individuals and conducted in accordance with applicable College procedures. Individuals who enter into contracts on behalf of the College should confirm the extent of their authority to do so on a regular, in most cases, annual, basis.
i. Consequences of Violations of College Policies

Each person is responsible for ensuring that his or her own conduct and the conduct of anyone reporting to him or her fully complies with this Code and with Dartmouth's policies. Violations may result in the taking of appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the procedures applicable to faculty or staff, as the case may be. Conduct representing a violation of this Code may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

III. REPORTING OF SUSPECTED VIOLATIONS

a. Reporting to Management - Dartmouth Personnel should report suspected violations of applicable laws, government or College regulations, government or industrial contract and grant requirements, or this Code. This reporting should normally be made initially through standard management channels, beginning with the immediate supervisor. Alternatively, employees may go to a higher level of management and may also report suspected violations or problems to Internal Audit, the Executive Vice President for Finance and Administration, or the General Counsel. If a violation is reported anonymously, the College will investigate the violation if sufficient detail is provided to allow for an investigation.

b. Cooperation - All employees should cooperate fully in the investigation of any misconduct.

IV. QUESTIONS ABOUT THIS CODE

Questions about this Code may be directed to the Office of the Executive Vice President or the Office of the General Counsel.


2 - Channels of reporting described in this Code are not intended to supersede specific grievance or other procedures established for particular situations. Where applicable, community members are advised to utilize such procedures. See, e.g., the equal opportunity grievance procedure:

http://www.dartmouth.edu/~ide/policies/grievance/index.html